

STATE OF INDIANA	,	HART SUPERIOR COURT 2
ELKHART COUNTY) SS: CAUSE NO	20D02-1106-PL-37
LEO VANNORMAN, et al.,)
Plaintiffs,)
v.		
FLEXSTEEL INDUSTRIES, COMPANY, LLC., HERITAG INC., DAVID DYGERT ANI	GE FINANCIAL GROUP,))) }
Defendants.		<i>)</i>

DEFENDANT FLEXSTEEL'S AMENDED RESPONSES TO PLAINTIFFS' FIRST REQUESTS FOR ADMISSION

Defendant, Flexsteel Industries, Inc. ("Flexsteel") amends its response to Plaintiffs' First Requests for Admission as follows:

GENERAL OBJECTIONS

Flexsteel hereby incorporates its general objections from its June 13, 2011 Responses to Plaintiffs' First Requests for Admission.

Request for Admission No. 9: Admit that You used adhesives in your operations at the Site that contained TCE.

RESPONSE:

Flexsteel admits, based on current information and knowledge, only that the Dygert Seating Division of Flexsteel may have purchased small supplies and/or sampled individual/household consumer-sized spray cans of 604 High Temperature Flexible Foam adhesive, which was an aerosol adhesive formulated to contain less than ½ an ounce TCE per aerosol spray can. Flexsteel otherwise denies this Request.

Flexsteel specifically denies that the Dygert Seating Division of Flexsteel ever purchased any adhesives in bulk which contained TCE. Based on current information and knowledge, the adhesives used by the former Dygert Seating Division of Flexsteel which were purchased in bulk, 55-gallon drums included some or all of the following: Premium Adhesive 30141-NFT, Premium Adhesive 30141-MS, and Premium Adhesive #7777. None of these adhesives

contained TCE. In 2001, the former Dygert Seating Division of Flexsteel replaced the Premium Adhesive with a two-part water-based adhesive, called Fastbond Contact Adhesive 2000-NF with Spray Activator. The Dygert Seating Division of Flexsteel also may have purchased small supplies and/or sampled the following adhesives, none of which contained TCE: BSA 5080, Contact Adhesive 30107, and M-6302 Adhesive.

Individuals with information responsive to this Request include Jerry Alexander, Dave Dygert, Greg Lucchese, Dennis Brosh of Chem-Tech, and Paul Bender of Benders Wholesale Distributors.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document has been served upon the following, by depositing the same in the United States mail, postage prepaid, this 30th day of June, 2011.

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